

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

1.	JESSICA F. LUCAS,)	
)	
	Plaintiff,)	
)	
v.)	Case No. CIV-15- 1186-D
)	
1.	FAIRFAX GOLF, LLC,)	
)	
	Defendant.)	

COMPLAINT

COME NOW THE PLAINTIFFS and hereby plead their claims as follows:

PARTIES

1. The Plaintiff is Jessica F. Lucas, an adult resident of Oklahoma County, Oklahoma.
2. The Defendant is Fairfax Golf Club, a business entity operating in Oklahoma County, Oklahoma.

JURISDICTION AND VENUE

3. Plaintiff's claims are for discrimination on the basis of sex and retaliation for reporting complaints of sexual harassment culminating in Plaintiff's termination in violation of Title VII of the Civil Rights Act of 1964 and Oklahoma's Anti-Discrimination Act. Jurisdiction over the federal claims is vested in this Court under 42 U.S.C. § 2000e-5(f)(3) and 28 U.S.C. § 1331. The state law claims arise out of the same core of facts and jurisdiction over them is vested under 28 U.S.C. § 1367(c).
4. Venue is provided by 42 U.S.C. § 2000e-5(f)(3) under which jurisdiction is appropriate in any district in the State. Plaintiff resides within Oklahoma County. Plaintiff worked out of Oklahoma County, Oklahoma, and the Defendant may be served in that County. Oklahoma County is located in the Western District of the United States District Court of Oklahoma wherefore, venue is proper in this court.

STATEMENT OF FACTS

5. Defendant employed fifteen (15) or more employees during each of at least twenty (20) weeks of the current or proceeding calendar year, and is a covered employer under Title VII. There is no minimum number of employees required to be covered by the OADA.
6. Plaintiff is an adult female who was employed by the Defendant from around March 1, 2014 until her unlawful termination around January 24, 2015.
7. During Plaintiff's employment, Plaintiff was sexually harassed by J. W. Armstrong (a co-owner of Defendant), however Plaintiff did not originally report this harassment against herself.
8. On or about October 2014, a subordinate employee reported to the Plaintiff that she had been verbally sexually harassed J.W. Armstrong.
9. Upon information and belief, this employee never returned to work and another employee was hired to replace her.
10. On or around December, 2014, the newly hired employee reported to Plaintiff that she was being sexually harassed by J.W. Armstrong.
11. Plaintiff reported this harassment to Rodney Armstrong (co-owner of Defendant).
12. Upon reporting the harassment, Plaintiff was sent home and not allowed to return to work until she had written statements about the harassment.
13. On or around January 24, 2015, Rodney told the Plaintiff she was fired for reporting the acts of sexual harassment.
14. As the direct result of such termination, the Plaintiff has suffered lost wages (including back, present and front pay along with the value of benefits associated with such wages), and dignitary harm/emotional distress type damages including stress, worry, and sadness.

15. Because the actions of the Defendant were willful, malicious or, at the least, in reckless disregard for Plaintiff's federally protected rights, Plaintiff is entitled to an award of punitive damages under federal law, and an award of liquidated damages under Oklahoma law.
16. Plaintiff exhausted her administrative remedies by timely filing a charge of discrimination on or about March 27, 2015. The EEOC issued Plaintiff's right to sue letter for her charge on or about August 19, 2015, which the Plaintiff received thereafter. This complaint is timely filed within ninety days of Plaintiff's receipt of her right to sue letter.

PRAYER

Plaintiffs respectfully requests this Court enter judgment in their favor and against the Defendant and grant them all compensatory damages suffered together with punitive damages, liquidated damages, attorneys' fees, costs and interest and such other legal and equitable relief as this Court deems just and proper.

RESPECTFULLY SUBMITTED THIS 20th DAY OF OCTOBER, 2015.

HAMMONS, GOWENS, HURST
& ASSOCIATES

s/ Leah M. Roper

Mark E. Hammons, OBA #3784

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JURY TRIAL DEMANDED

ATTORNEY'S LIEN CLAIMED